## EXHIBIT A

## Declaration of Dong Won Kwak

1. My name is Dong Won Kwak.

2. This declaration is based on my personal knowledge, and is made under

penalty of perjury as provided in 28 U.S.C. § 1746.

- 3. I am a leader of Korea CGM Members Association which operates through the Christian Gospel Mission ("CGM") and hold the title of Representative. I have responsibility within CGM for managing the legal proceedings regarding CGM's allegations of defamation against Netflix arising from the Netflix series, In the Name of God: A Holy Betrayal, and am authorized to make this declaration on its behalf
- 4. CGM made the decision to sue Netflix in Delaware, the state in which Netflix is incorporated, because CGM believed that jurisdiction over Netflix in that state would be automatic and could not be contested by Netflix, whereas CGM could not be certain that Korea would have jurisdiction over Netflix under Korean criminal or civil defamation laws.
- 5. The assurance of jurisdiction over Netflix in Delaware was the motivating consideration underlying the decision by CGM to pursue defamation litigation under American law in Delaware, rather than in Korea.

Signed:

Dong Won Kwak

Dated: September 6, 2024